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10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA
12

13 **RONNELL RAY HILL,**

Petitioner,

14
15 **v.**

16 **V.M. ALMAGER, Warden,**

17 Respondent.
18

C 07-3229 JSW (PR)

**DECLARATION OF ANN P.
WATHEN**

19 I, ANN P. WATHEN, declare as follows:

20 I am the Deputy Attorney General assigned to respond to the Order to Show Cause (OSC)
21 in the present case. The state appeals were denied in 2005 and 2006.

22 As discussed below, I am requesting an additional 60 days to respond to the petition for
23 writ of habeas corpus in the instant case. During the past two months, I have filed respondent's brief
24 in *People v. Shephard* (H030646) on December 31, 2008; an ex parte application and a motion for
25 reconsideration in *John Doe v. Brown* (San Mateo County Superior Court, Case No. 466503) on
26 January 3, 2008; respondent's brief in *People v. Wilkins* (H030882) on January 23, 2008; a new and
27 different motion for reconsideration, a motion for leave to amend, and an amended return in *John*
28 *Doe v. Brown* (San Mateo County Superior Court, Case No. 466503) on January 25, 2008;

1 respondent's answer in *Washington v. T. Felker* (C 06-7660 MJJ (PR)) on February 11, 2008; and
2 respondent's answer in *Preston v. Campbell* (C 05-5154 RMW) on February 15, 2008. I also
3 attended hearings in *John Doe v. Brown* (San Mateo County Superior Court, Case No. 466503) on
4 January 4 and 15, 2008, and presented an oral argument in *People v. Chun* (H030461) on February
5 21, 2008. I recently completed respondent's brief in *People v. Maldonado* (H031506), which my
6 supervisor is currently reviewing. I am presently working on respondent's brief in *People v. Helton*
7 (A115489), and preparing for an upcoming hearing in *John Doe v. Brown* (San Mateo County
8 Superior Court, Case No. 466503). With respect to the instant case, I have obtained the file from
9 storage and determined that the federal habeas petition is timely. I also recently obtained a copy of
10 the state habeas petition filed with the California Supreme Court (S147089) on October 4, 2006, and
11 have determined that appellant has exhausted his claims.

12 WHEREFORE, respondent respectfully requests that the time for filing a response be
13 enlarged to April 29, 2008.

14 Dated: January 25, 2008

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16
17 /s/ Ann P. Wathen
18 ANN P. WATHEN
19 Deputy Attorney General

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